

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

CYNTHIA K. DAVIS,

Plaintiff,

V.

CITIBANK, N.A.,

Defendant.

Case Number: 4:14-cv-01129-CDP

MEET AND CONFER ISSUES

(a) The status of discovery and the scope of the proposed class;

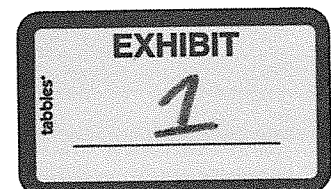
The parties have exchanged Rule 26 disclosures, and are cooperating in further exchange of information that bear on the potential size of the class. Further, formal discovery is being pursued now. The scope of the proposed class will be limited to transactions relating to lines of credit and loans that are secured by properties located in Missouri.

(b) Whether the parties still anticipate using experts and taking expert depositions regarding class certification;

The parties do not contemplate the use of experts for this purpose.

(c) Whether it is necessary to set the deadline for filing a class certification motion on March 15, 2016, or whether that deadline can be set earlier (in no event will the deadline be later than March 15, 2016);

Plaintiff shall file her Rule 23 motion for class certification and all supporting evidence by March 15, 2016. Defendant shall file its opposition and all supporting evidence to Plaintiff's



Rule 23 motion by April 14, 2016. Plaintiff shall file her reply memorandum in support of her Rule 23 motion by April 29, 2016.

(d) Whether, and how soon, this matter should be referred to alternative dispute resolution;

This Court should refer this case to alternative dispute resolution on April 14, 2016.

(e) An appropriate hearing date for any motion for class certification;

May 2, 2016.

(f) Any other matter the parties would like to discuss with the Court;

Defendant believes the issue of the applicable statute of limitations should be addressed sooner rather than later. In the past, Plaintiff has alluded to seeking discovery and class certification for a 10-year period. Defendant believes the applicable statute of limitations is five (5) years.

Dated: August 14, 2015

Respectfully submitted,

BICK & KISTNER, P.C.

By: /s/
Elkin L. Kistner, #35287MO
elkinkis@bick-kistner.com
101 South Hanley Road, Suite 1280
St. Louis, Missouri 63105
(314) 571-6823; (314) 727-9071 (facsimile)

LAW OFFICES OF DAVIS & GARVIN

By: /s/
James W. Davis, #36921MO
jdavis@davisgarvinlaw.com
325 N. Kirkwood Road, Suite 210
St. Louis, Missouri 63122
(314) 822-8100 Ext. 22; (314) 965-3369 (facsimile)

ROBERTS, WOOTEN & ZIMMER, L.L.C.

By: /s/

Kevin C. Roberts, #31578MO

kevinroberts@rwzlaw.com

P.O. Box 888

Hillsboro, Missouri 63050

(636) 797-2693

Attorneys for Plaintiff

BRYAN CAVE LLP

By: /s/

Louis F. Bonacorsi, #28331MO

lfbonacorsi@bryancave.com

Jason A. Kempf, #59897MO

jason.kempf@bryancave.com

Alicia E. Ragsdale #66168MO

ali.ragsdale@bryancave.com

211 North Broadway, Suite 3600

St. Louis, MO 63102

(314) 259-2000; (314) 259-2020 (facsimile)

Attorneys for Defendant

Citibank, N.A.

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on this 17th day of August, 2015, the foregoing was electronically filed with the Clerk of the Court using the CM/ECF system to be served by operation of the Court's electronic filing system to all counsel of record.

/s/Elkin L. Kistner